

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In Re: NEURONTIN MARKETING AND
SALES PRACTICES LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

MDL Docket No. 1629

Master File No. 04-10981

Judge Patti B. Saris

MOTION TO ADMIT COUNSEL PRO HAC VICE

Pursuant to Local Rule 83.5.3, the undersigned counsel, James S. Harrington, hereby moves the Court for an Order allowing Jeffrey R. Vesel, Robins, Kaplan, Miller & Ciresi L.L.P., 2800 LaSalle Plaza, 800 LaSalle Avenue, Minneapolis, MN 55402-2015, tel. 612-349-8296 to appear and practice *pro hac vice* on behalf of non-class third party payor plaintiffs¹ that were transferred to the above-captioned action from *Assurant Health et al v. Pfizer Inc. et al*, Civil Action No. 2:05-cv-0095 (MCA) (D.N.J.). As grounds for this motion, the undersigned states that:

1. I am duly admitted to practice before this Court and represent the non-class third party payor plaintiffs in the above-captioned action.
2. Mr. Vesel has prepared the Certification required by Local Rule 83.5.3(b), which has been filed together with this Motion.
3. I have provided Mr. Vesel with a complete copy of the Local Rules of the United States District Court for the District of Massachusetts.

¹ The non-class third party payor plaintiffs consist of the following health benefit providers: American Medical Security, Assurant Health, Blue Cross Blue Shield of Massachusetts, Blue Cross Blue Shield of Minnesota, Blue Cross and Blue Shield of Nebraska, CareFirst, Excellus Health Plan, Inc., Group Health Service of Oklahoma, d/b/a Blue Cross Blue Shield of Oklahoma; Hawaii Medical Service Association, d/b/a Blue Cross Blue Shield of Hawaii, Health Care Service Corporation (Blues of Illinois, Texas and New Mexico), Horizon Health Care Services, Inc., d/b/a Horizon Blue Cross Blue Shield of New Jersey; Humana Inc., Louisiana Health Service and Indemnity Co., d/b/a Blue Cross and Blue Shield of Louisiana; Medmutual of Ohio; Mutual of Omaha Insurance Company, Offord Health Plans, LLC; The Regence Group; Wellmark, Inc., d/b/a Wellmark Blue Cross Blue Shield of Iowa and Wellmark South Dakota, d/b/a Blue Cross and Blue Shield of South Dakota.

4. Jeffrey R. Vesel is an attorney at the firm of Robins, Kaplan, Miller & Ciresi L.L.P. He is admitted to the United States District Court in the District of Minnesota and the highest court of the state of Minnesota.

WHEREFORE, the undersigned counsel respectfully moves that Mr. Vesel be admitted to practice before this Court *pro hac vice*.

Dated: _____, 2005 Respectfully submitted,

_____/s/ James S. Harrington
James S. Harrington
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*Attorneys for Non-Class Third Party Payor Plaintiffs,
formerly of Assurant Health et al v. Pfizer Inc. et al, Civil
Action No. 2:05-cv-0095 (MCA) (D.N.J.).*

STATEMENT REGARDING LOCAL RULE 7.1(A)(2)

Counsel for the Plaintiffs who are non-class third party payors, formally in *Assurant Health et al. v. Pfizer, Inc. et al.*, have conferred with counsel for Defendant, Pfizer, and there is no objection to this Motion for Admission *Pro Hac Vice*.

____/s/James S. Harrington
James S. Harrington

DATED: _____, 2005

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CERTIFICATE OF GOOD STANDING

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, I, Jeffrey R. Vesel, hereby certify that:

1. I was admitted to the bar of the State of Minnesota in 2003. I was also admitted to practice in the United States District Court, District of Minnesota in 2003.

2. I am a member in good standing in every jurisdiction where I have been admitted to practice.

3. No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. My name, firm address and telephone number is as follows:

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Jeffrey R. Vesel

Dated: April 29, 2005